

## Message

**From:** Maria Powell (MEJO) [mariapowell@mejo.us]  
**Sent:** 5/10/2017 2:52:28 PM  
**To:** Ramanauskas, Peter [ramanauskas.peter@epa.gov]  
**Subject:** Re: question about PCB remediation/closure

FYI, in case you don't already know this, the Goodman Community Center is directly adjacent to Madison Kipp, to the north.

On 5/10/2017 9:39 AM, Maria Powell (MEJO) wrote:

> Peter,  
 >  
 > Thank you--I appreciate the response. There's no particular rush, just  
 > get back to me when you can.

>  
 > Maria

>  
 > On 5/9/2017 4:41 PM, Ramanauskas, Peter wrote:  
 >> Hello Ms. Powell,

>>  
 >> Thank you for the additional information. I will look it over so I  
 >> can better understand the site history and get back to you. In the  
 >> meantime, I did want to let you know that I will be out of the office  
 >> tomorrow and will review the information you attached when I return.

>>  
 >> Thank you,  
 >> Peter

>>  
 >> -----Original Message-----

>> From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]  
 >> Sent: Tuesday, May 09, 2017 3:31 PM  
 >> To: Edelstein, Gary A - DNR <Gary.Edelstein@wisconsin.gov>  
 >> Cc: Ramanauskas, Peter <ramanauskas.peter@epa.gov>  
 >> Subject: Re: question about PCB remediation/closure

>>  
 >> Thanks Gary, this is helpful. I'm sorry--yes, I mean the  
 >> closure/registry packet on BRRTS:  
 >> <http://dnr.wi.gov/botw/DownloadBlobFile.do?docSeqNo=34405>

>>  
 >> I didn't realize that contaminated in-place building material didn't  
 >> need to be part of this document--so thanks for clarifying that.  
 >> According to the closure request report, in 2005 a previous  
 >> consultant gathered four shallow soil samples and had them tested for  
 >> PCBs and reported that "none of the samples contained detectable  
 >> concentrations."  
 >> See attached, pg. 18. This PCB data isn't included with the other  
 >> data, nor are maps of where the samples were taken, etc (unless I am  
 >> missing it). They didn't test any other media or do any PCB testing  
 >> after 2005.

>>  
 >> Given the past uses of the building, the fact that PCBs were found  
 >> throughout the building, past uses of the building, and that it was  
 >> to be developed into a community center, it seems they would have  
 >> tested more thoroughly in the soils there. But I don't know what the  
 >> policies/guidances are on this, if any.

>>  
 >> Mr. Ramanauskas, can you clarify this and my previous questions?

>>  
 >> Thanks,  
 >> Maria

>>  
 >> On 5/9/2017 10:55 AM, Edelstein, Gary A - DNR wrote:

>>> Hello Maria,  
 >>>  
 >>> As stated in our guidance, our Program doesn't regulate in-place PCB  
 >>> contaminated building material. I believe you were referring to our  
 >>> guidance when you mentioned the 2014 MOU. If not, our guidance is  
 >>> here:

>>>  
 >>> [http://prodoasext.dnr.wi.gov/inter1/pk\\_rr\\_doc\\_public\\$doc.QueryViewByKey?P\\_DOCUMENT\\_SEQ\\_NO=16150&Z\\_CHK=62798](http://prodoasext.dnr.wi.gov/inter1/pk_rr_doc_public$doc.QueryViewByKey?P_DOCUMENT_SEQ_NO=16150&Z_CHK=62798)  
 >>>

>>> EPA regulates such material under TSCA. I've cc'd Peter Ramanauskas  
>>> at EPA Region 5, who can hopefully respond to your questions directly.  
>>>  
>>> As far as a closure package is concerned, to what are you  
>>> referring? A package submitted to our Program for contaminated soil  
>>> and/or groundwater cleanup? If so, again, the contaminated in-place  
>>> building material need not be part of such a package if the PCB  
>>> contamination never reached or was not found in any environmental  
>>> media, e.g., soil or groundwater.  
>>>  
>>> Please let me know if you have any further questions.  
>>>  
>>> Thanks, Gary E  
>>>  
>>> -----Original Message-----  
>>> From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]  
>>> Sent: Monday, May 08, 2017 3:06 PM  
>>> To: Edelstein, Gary A - DNR  
>>> Subject: question about PCB remediation/closure  
>>>  
>>> Hello Gary:  
>>>  
>>> I have a question about DNR/EPA regs regarding PCBs. I have the  
>>> DNR/EPA One Cleanup MOU from 2014.  
>>>  
>>> I'm looking at PCB data (7 aroclors) from wood columns and floors of  
>>> the Goodman Center before it was redeveloped in 2008. See attached  
>>> data.  
>>>  
>>> For the floors, the consultant closure summary report said that "All  
>>> identified PCB-contaminated surfaces within the main building have  
>>> been either cleaned or encapsulated" and "the entire production  
>>> floor of the main building approximately 20 inches." For the wood  
>>> columns, it says:  
>>> "The bottom sections of the wooden support columns were cut off at an  
>>> elevation approximately 18 inches above the new concrete floor and  
>>> replaced with steel supports. RBE then washed the remaining upper  
>>> portions of the wood columns with a cleaning solution to remove the  
>>> 100-year accumulation of industrial grime. During construction,  
>>> columns  
>>> C6 and D6 were encased in cinder blocks. Retesting of the remaining  
>>> portions of wood columns C8, D7, D8, and D12 showed that residual  
>>> PCB concentrations exceeded 1 mg/kg only at column D-12. Column D-12  
>>> was therefore wrapped and covered with a new layer of wood trim. The  
>>> columns with residual PCB contamination were labeled as  
>>> PCB-contaminated before they were covered."  
>>>  
>>> The PCB data is not in the closure package, nor is there any mention  
>>> of their presence in the building in the closure package--unless I  
>>> am missing it.  
>>>  
>>> Is there anything else they should have included? I'm trying to  
>>> understand how this process works.  
>>>  
>>> Thanks,  
>>> Maria Powell  
>>>  
>>>  
>>>  
>>>  
>>>  
>>>  
>